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United States of America
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SEALED

9   IN THE UNITED STATES DISTRICT COURT

10   EASTERN DISTRICT OF CALIFORNIA

11

12 UNITED STATES OF AMERICA,   CASE NO.   **1:25-cr-00074-KES-BAM**

13   Plaintiff,   MOTION AND PROPOSED ORDER TO
                                               SEAL INDICTMENT
14   v.

15 MICHAEL KULIKOFF

16

17   Defendant,

18

19

20   The government moves the Court, pursuant to Rule 6(e) of the Federal Rules of

21 Criminal Procedure, to order and direct that the Indictment returned by the Grand Jury

22 on April 10, 2025 charging the above defendant with violations of Count One: 18 U.S.C. §

23 371 – Conspiracy to Transport and Cause to Be Transported a Hazardous Waste Without

24 a Manifest; Count Two: 42 U.S.C. §§ 6928(d)(5) and 6928(e) – Transportation of

25 Hazardous Waste Without a Manifest; Knowing Endangerment of Others; 18 U.S.C. §

26 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture, be kept secret until the

27 defendant named in this Indictment is either in custody or has been given bail on these

28 offenses; and further order that until such time as the defendant is in custody or has been

Motion to Seal Indictment   1

given bail, that no person shall disclose the finding of the Indictment or any warrants issued pursuant thereto, except when necessary for the issuance and execution of the warrants.
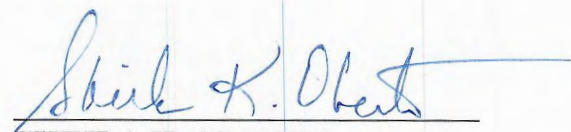
Dated: April 10, 2025   Respectfully submitted,

                                         MICHELE BECKWITH
                                         Acting United States Attorney

                              By   _/s/ Jeffrey A. Spivak_
                                    JEFFREY A. SPIVAK
                                    Assistant U.S. Attorney

                              IT IS SO ORDERED.

Dated: April 10, 2025

                                    SHEILA K. OBERTO
                                    U.S. Magistrate Judge

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